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Attorneys for Plaintiff
 United States of America

UNITED STATES DISTRICT COURT
 SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RUDOLFO TORREZ,

Defendant.

Criminal Case No. 07CR1008-LAB

Date: July 7, 2008

Time: 2:00 p.m.

Place: Courtroom 9

The Honorable Larry A. Burns

**UNITED STATES' NOTICE OF MOTIONS
 AND MOTIONS IN LIMINE TO:**

- (A) EXCLUDE WITNESSES;
- (B) ADMIT A-FILE DOCUMENTS;
- (C) ADMIT CERTIFICATE OF NON-EXISTENCE;
- (D) ADMIT TAPE AND TRANSCRIPT OF DEPORTATION HEARING;
- (E) ADMIT CERTIFIED TRANSCRIPTS
- (F) ADMIT EXPERT TESTIMONY;
- (G) ADMIT 404(b) AND 609 EVIDENCE;
- (H) PROHIBIT COLLATERAL ATTACK OF DEFENDANT'S DEPORTATION;
- (I) PROHIBIT CERTAIN TYPES OF REFERENCES BY DEFENDANT;
- (J) PRECLUDE EXPERT TESTIMONY BY DEFENSE;
- (K) PRECLUDE ARGUMENT REGARDING WARNING;
- (L) PRECLUDE ARGUMENT OF DURESS AND NECESSITY;
- (M) PRECLUDE SELF-SERVING HEARSAY; AND
- (N) RENEWED MOTION FOR RECIPROCAL DISCOVERY

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PLEASE TAKE NOTICE that on July 7, 2008, at 2:00 p.m., or as soon thereafter as counsel may be heard, plaintiff, UNITED STATES OF AMERICA, by and through its counsel, Karen P. Hewitt, United States Attorney, and Joseph J.M. Orabona, Assistant United States Attorney, will move the Court to enter an order granting the following motions in limine to:

1. Exclude All Witnesses Except Case Agent;
2. Admit A-File Documents And Testimony by the A-File Custodian;
3. Admit Certificate Of Non-Existence;
4. Admit Audiotape And Transcript Of Deportation Hearing;
5. Admit Certified Transcripts of Prior Plea Colloquy;
6. Admit Expert Testimony;
7. Admit 404(b) and 609 Evidence;
8. Prohibit Collateral Attack Of Deportation;
9. Prohibit Certain Types of References by Defendant;
10. Preclude Expert Testimony By Defense
11. Preclude Argument Regarding Warning;
12. Preclude Argument Regarding Duress And Necessity;
13. Preclude Self-Serving Hearsay; and
14. Renewed Motion For Reciprocal Discovery

The motions in limine noted above are based on the files and records of this case, together with the a separately captioned statement of facts and memorandum of points and authorities.

DATED: June 16, 2008

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

/s/ Joseph J.M. Orabona
JOSEPH J.M. ORABONA
Assistant United States Attorney